

Re: Quebecor 

Susan Hodges to: Maureen Essenthier

01/24/2008 02:45 PM

History: This message has been replied to.

Yup, each has record preservation requirements. I agree, unless there is some compelling reason not to, we should terminate both orders. I'll prepare a draft notice/letter over the next few days and send it to you for review.

Maureen Essenthier/R3/USEPA/US




**Maureen
Essenthier/R3/USEPA/US**

01/24/2008 02:37 PM

To Susan Hodges/R3/USEPA/US@EPA

cc

Subject Re: Quebecor 

We can terminate both orders. Are they required to maintain records under both orders?

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Susan Hodges/R3/USEPA/US

**Susan
Hodges/R3/USEPA/US**

01/24/2008 01:36 PM

To Maureen Essenthier/R3/USEPA/US@EPA

cc

Subject Quebecor

It looks like the Attachment A Order (RCRA-3-003th) was for pre-implementation work and it appears as though all of the requirements have been met. Those tasks are identified as having been performed in the subject Order (RCRA-3-014th) but the Attachment Order has not been terminated either.

There may be separate records (and maybe other obligations) that are required to be maintained by virtue of this Attachment A Order. So, this initial Attachment Order may include continuing obligations for Quebecor that are not subsumed in the more recent Order which we are now terminating.

Maybe we should identify and terminate both Orders. If you are aware of some reason why we should not terminate both orders, please let me know.